

Paul Solomon
3307 Meadow Oak Drive
Westlake Village, CA 91361
Paul.solomon@pb-ev.com

May 5, 2025

The Honorable Stephen A. Feinberg
Dep. Secretary of Defense
1010 Defense Pentagon
Washington, DC 20301-1010

Subj: Recommendation for Workforce Acceleration & Recapitalization

Dear Hon. Dep. Secretary of Defense Feinberg:

My previous letters to you and Mr. Moranis recommended reduction of DCMA Earned Value Management System (EVMS) compliance review personnel. The reduction should be a precedent to the real need; rescind the DFARS EVMS clause. This letter conveys evidence that the EVMS compliance review process is labor-intensive and should be a candidate for the Workforce Acceleration & Recapitalization Initiative in your memorandum dated April 7.

Another candidate is the award fee process on cost plus contracts. It is labor-intensive besides being counter-productive. This information augments my previous arguments that subjectively determined award fees should be eliminated.

The compliance review and award fee efforts fail the following tests in your memorandum:

Every role must now meet a simple test: If this position didn't exist today, and we were at war tomorrow, would we create it?

- Mission-First Alignment: Every civilian role should directly enable lethality, readiness, or strategic deterrence. If not, it should be reclassified, outsourced, or removed.
- Speed Over Process: Civilian structures should support rapid deployment of capabilities, not delay them. We should eliminate unduly burdensome reviews and legacy coordination rituals that are misaligned with that vision.
- No Vestiges of the Past: This realignment is driven by current mission urgency. Civilian roles that cannot be directly tied to today's operational priorities should be consolidated or eliminated, without deference to legacy structures, historical jurisdictions, or institutional memory.
- Digital-First Operations: We should modernize or eliminate manual workflows, paper-based processes, and outdated IT platforms and leverage automation and artificial intelligence to power the mission impact of our civilian workforce.

Before retirement from Northrop Grumman, I performed joint EVMS surveillance with DCMA on the F-35 program. The attached documents are evidence that EVMS procedures and the products of compliance reviews are highly manual and time-consuming. The documents were evidence in my Joint Strike Fighter (JSF) whistleblower lawsuit.

- EVMS Discrepancy Report
- Lockheed Martin EVMS Process Description 6.0: Revisions and Change Management

The last attachment is a letter, Subj: JSF Award Fee Period 11 Focus Letter.

Besides being labor-intensive, executing EVM processes and preparing for compliance reviews diverts the valuable time of DoD program managers, contractor program managers, engineering managers etc. from building a weapon system that works to preparing documents and undergoing ineffective audits.

Believe me that their EVM-related effort does not directly enable lethality, readiness, or strategic deterrence.

Yours truly,

A handwritten signature in blue ink that reads "Paul J. Solomon". The signature is fluid and cursive, with a long horizontal stroke at the end.

Paul Solomon

CC:

Hon. Pete Hegseth, USD	Hon. Tammy Duckworth, SASC
Hon. Glen Grothman, HOAC	Hon. Adam Smith, HASC
Hon. Ken Calvert, HAC	Hon. Mike Rogers, HASC
Hon. Robert J. Wittman, HASC	Hon. Donald Norcross, HASC
Hon. Ro Khana, HASC	Hon. Jim Jordan, HCOA
Hon. Roger Wicker, SASC	Hon. Joni Ernst, SASC
Hon. Elizabeth Warren, SASC	DOGE
Jon Sindreu, WSJ	Anthony Capaccio, Bloomberg News
Stephen Feinberg, DoD	

Attachment

Docket (FTC-2025-0028) Document: Comment Regarding Reducing Anti-Competitive Regulatory Barriers, Comment tracking number m9m-9lc3-tktx

Public Comment by Paul Solomon

(1) Introduction

I retired from Northrop Grumman Corp. and worked on defense contracts for over thirty years. I was an Earned Value Management (EVM) Specialist and performed compliance reviews for compliance with FAR and Defense Federal Acquisition Regulation Supplement (DFARS) clauses 252.234-7001 and 252.234-7002. I received the DoD David Packard Excellence in Achievement Award for work on the EVM System Standard EIA-748 and received a letter of appreciation from Sen. John McCain for supporting him on defense acquisition reform (McCain letter, Attach. 1).

(2) Background

The regulation requires a contractor's program management processes to be compliant with the thirty-two guidelines in EIA-748. Also, defense contractors must pass initial compliance reviews and ongoing surveillance reviews by the Defense Contract Management Agency.

Potential new competitors for defense contracts normally must hire specialized consultants to prepare a bid for a contract that includes the EVMS clause, to revise its internal processes so to be compliant with the guidelines, and to train its personnel on those processes. All the non-recurring work is very expensive in terms of consulting costs and personnel costs. To understand the complexity of the non-recurring effort, please review excerpts from the marketing materials of one of the EVM consultants (Consultant, Attachment 2).

(3) Analysis

After contract award, a contractor must undergo ongoing surveillance or compliance audits. These are intrusive, time-consuming, and a non-productive waste of time for the engineers and managers that should be developing the weapon system.

Historically, potential bidders that have the technical and management expertise to develop needed weapon systems with new technologies have chosen not to bid because of the EVM barrier to entry.

Grant Thornton's 2016 Government Contractor Survey is based on information provided by companies that do business with the federal government as a primary customer. We distributed questionnaires and received responses from participating companies between

April and August of 2016. Respondents to the 2016 survey are from small, medium, and large companies and include both publicly and privately owned institutions. Seventy percent of respondents to the *Grant Thornton 2016 Government Contractors Survey* stated they would not use EVMS if not required to do so. Twenty-eight percent reported having contracts that require use of EVMS. Of those using EVMS, only 37 percent believe it to be a cost-effective management tool and only 25 percent would adopt EVMS voluntarily.

Regarding the EVM Specialist consultants, the government personnel normally receive specialized training offered by Defense Acquisition U(DAU). The DAU credential is also a barrier to entry for the large universe of project management consultants that are certified by the Project Management Institute as Project Management Professionals (PMP). The PMP certificate is widely held and respected in the commercial business world.

(4) Additional References

Additional, detailed rationale to rescind the FAR/DFARS EVMS clauses is provided in the letter to the Hon. Shalanda Young, Director, OMB, Subj: *Transition Actions for You and Chief of Staff Zients*, November 24, 2024, Attachment 3, and the white paper, *Common Sense Project Management: "When you come to a fork in the road..."* —Paul Solomon, 3/28/25. Attachment 4.

- (5) Conclusion: Rescind the FAR/DFARS EMS clauses to remove barriers to entry facing potential weapon system contractors that are needed to provide new technologies at competitive prices.